

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

KEITH I. SCHORR, SUSAN SCHORR, :  
in their own right and as personal :  
representatives of the ESTATE OF :  
RYAN K. SCHORR :

v. :

Plaintiffs, :

BOROUGH OF LEMOYNE, et al. :

Defendants. :

JURY TRIAL DEMANDED

HONORABLE YVETTE KANE

FILED  
HARRISBURG

MAR 25 2003

NO. 1:CV-01-0930

MARY E. D'ANDREA, CLERK

Per M.E.  
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**PLAINTIFFS' REPLY TO THE MOTION FOR SUMMARY  
JUDGMENT OF DEFENDANTS WEST SHORE REGIONAL  
POLICE COMMISSION AND CHIEF HOWARD DOUGHERTY**

For all the reasons stated in plaintiffs' accompanying brief, there are ample issues of material facts in plaintiffs' action against moving defendants. Defendants have failed to meet the burden of establishing their right to judgment as a matter of law, and their motion must, therefore be denied.

Respectfully submitted,

  
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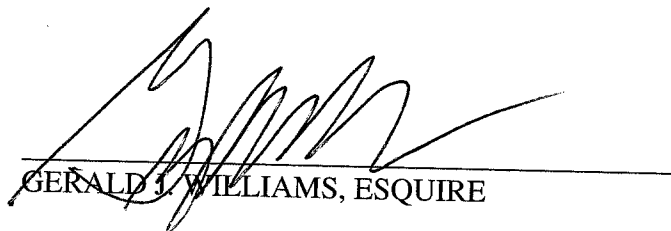
Dated: March 24, 2003

**CERTIFICATE OF SERVICE**

I, GERALD J. WILLIAMS, hereby certify that on this date I served a true and correct copy of the foregoing Plaintiffs' Reply to The Motion of Summary Judgment of Defendants West Shore Regional Police Commission and Chief Howard Dougherty by first class mail, postage prepaid upon the following counsel:

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GERALD J. WILLIAMS, ESQUIRE

Dated: March 24, 2003